



## MEMO ENDORSED

Ian C. Ballon  
Ballon@gtlaw.com  
L.A. Direct Dial: 310.586.6575  
Palo Alto Direct Dial: 650.289.7881

October 4, 2023

Hon. Sidney H. Stein  
U.S. District Court, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Graham v. Prince, et al.*, No. 1:15-cv-10160-SHS (S.D.N.Y.) –  
Redaction and Sealing of Documents**

Dear Judge Stein:

We represent Defendants Richard Prince in the above-referenced case and write on behalf of ourselves and Defendants Laurence Gagosian and Gagosian Gallery, Inc. (the “Gagosian Defendants,” and collectively with Mr. Prince, the “Defendants”). We submit this letter pursuant to Section 5(B) of Your Honor’s Individual Practices.

Certain portions of the Memorandum of Law in Support of Defendants’ Motion for Security for Costs Pursuant to Local Rule 54.2, and the exhibits attached to the accompanying Declaration, have been designated by Plaintiff Donald Graham and the Gagosian Defendants as “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only” (the “Protected Material”) under the Stipulated Protective Order entered in this case on January 29, 2018. The Protected Material includes information that Plaintiff and the Gagosian Defendants have previously identified as confidential commercial/business information, non-public financial information, and/or confidential customer information. Accordingly, we respectfully request an Order permitting Defendants to file under seal documents containing purportedly Protected Material, and briefing papers to the extent they reflect any such Protected Material. Where possible and to the extent necessary, Defendants also request permission to file placeholders and/or redacted versions of such documents, testimony, and papers via ECF. *SHC L*

Thank you for your consideration of this important argument and issue.

cc: Counsel of Record (*via ECF*) Respectfully submitted,

The requests as set forth above are granted.

Dated: New York, New York  
October 5, 2023

*for*  
Ian. C. Ballon

**SO ORDERED:**

*Sidney H. Stein*  
\_\_\_\_\_  
Sidney H. Stein, U.S.D.J.

Albany  
Amsterdam  
Atlanta  
Austin  
Berlin-  
Boston  
Charlotte  
Chicago  
Dallas  
Delaware  
Denver  
Fort Lauderdale  
Houston  
Las Vegas  
London\*  
Long Island  
Los Angeles  
Mexico City+  
Miami  
Milan»  
Minneapolis  
New Jersey  
New York  
Northern Virginia  
Orange County  
Orlando  
Philadelphia  
Phoenix  
Portland  
Riyadh\*  
Sacramento  
Salt Lake City  
San Diego  
San Francisco  
Seoul»  
Shanghai  
Silicon Valley  
Singapore\*  
Tallahassee  
Tampa  
Tel Aviv^  
Tokyo\*  
Warsaw~  
Washington, D.C.  
West Palm Beach  
Westchester County  
Operates as “Greenberg Traurig Germany, LLP.”  
\*A separate UK registered legal entity;  
“Greenberg Traurig, S.C., “Greenberg Traurig  
Santa Maria,” “Greenberg Traurig LLP Foreign  
Legal Consultant Office,” A branch of Greenberg  
Traurig, P.A., Fibrope, USA,” “GT Tokyo Honbu  
Jinruku and Greenberg Traurig  
Gakushochoymabegata Jinsoku, “Greenberg  
Traurig, P.A., Fibrope, USA,” “GT Tokyo Honbu  
Jinruku and Greenberg Traurig Singapore LLP which is  
licensed as a foreign law practice in Singapore; “  
Greenberg Traurig, P.A. is applying to register a  
joint venture in Saudi Arabia